

ILLINOIS COMMERCE COMMISSION

DOCKET No. 12-0598

REBUTTAL TESTIMONY ON REHEARING

OF

DONELL MURPHY

Submitted On Behalf

Of

AMEREN TRANSMISSION COMPANY OF ILLINOIS

December 2, 2013

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**REBUTTAL TESTIMONY ON REHEARING OF
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Ameren Transmission Company of Illinois

I. INTRODUCTION

Q. Please state your name, business address and present position.

A. My name is Donell Murphy. I am a Partner with Environmental Resources Management, located at 1701 Golf Road, Suite 1-700, Rolling Meadows, Illinois 60008.

Q. Are you the same Donell Murphy who previously sponsored testimony in this proceeding?

A. Yes, I am.

II. PURPOSE AND SCOPE

Q. What is the purpose of your rebuttal testimony on rehearing?

A. My testimony responds to the Intervenor and Staff direct testimony concerning the Meredosia to Pawnee route and Mt. Zion to Kansas route. As I explain in my testimony, no party has provided a compelling reason for the Commission to alter the Meredosia to Pawnee route as approved in the August 2013 Final Order. With regard to Mt. Zion to Kansas, I explain ATXI's proposal to connect to the approved portion of this segment from Staff's alternative locations for the Mt. Zion substation.

III. MEREDOSIA TO PAWNEE

Q. Have any Intervenor's filed direct testimony on rehearing concerning the Meredosia to Pawnee route?

A. Yes. Andrew and Stacey Robinette submitted testimony supporting a change to a small portion of the route approved in the August 2013 Final Order. Morgan, Sangamon and Scott Counties Land Preservation Group (MSSCLPG) submitted testimony supporting an entirely different route.

Q. Are the routes you just described the same routes shown in Figure 2 of your direct testimony on rehearing?

A. Yes.

Q. In the direct testimony you filed in the Robinette portion of this rehearing proceeding (ATXI Ex. 2.0(RRH)), you testified that ATXI was not aware of whether the Robinette's neighbors would object to their proposed route modification. Has any additional information come to your attention on this subject?

A. Yes. One of those neighbors, Mr. Wayne Edwards, testifies that MSSCLPG opposes the Robinette modified routing proposal. (MSSCLPG Ex. 5.0.) Mr. Edwards objects to the modification specifically because it will bisect his farmland, interfere with his farming operations, and impact the value of his property. He also states that the group opposes the modification for fear that it could hamper or eliminate the future development of a water source located on one of the member's property.

42 **Q. What is ATXI's recommendation?**

43 **A.** The Company recommends that the Commission reject the Robinette route modification.
44 While technically feasible, this modification would simply shift the impact of the line from the
45 Robinette's to their neighbors.

46 **Q. Why does MSSCLPG want the Commission to reverse its prior decision and order**
47 **an entirely different route?**

48 **A.** As I understand their testimony, seven of the eight witnesses who testify on behalf of
49 MSSCLPG are landowners; generally farmers. Their basic complaint is that the line will run too
50 close to their property. They want the Commission to order ATXI to build the line in an existing
51 138 kV corridor, away from their property. MSSCLPG's eighth witness, an electric engineer,
52 concludes that it would be feasible to build the line along the existing 138 kV corridor.

53 **Q. Does any of this testimony lead you to question the recommendation you made in**
54 **your direct testimony on rehearing?**

55 **A.** No. As I explained in my direct testimony, the route approved in the August 2013 Final
56 Order was stipulated among ATXI, MSCLTF and FutureGen. ATXI sees no reason to unwind
57 this agreement simply to satisfy a different set of landowners.

IV. MT. ZION TO KANSAS

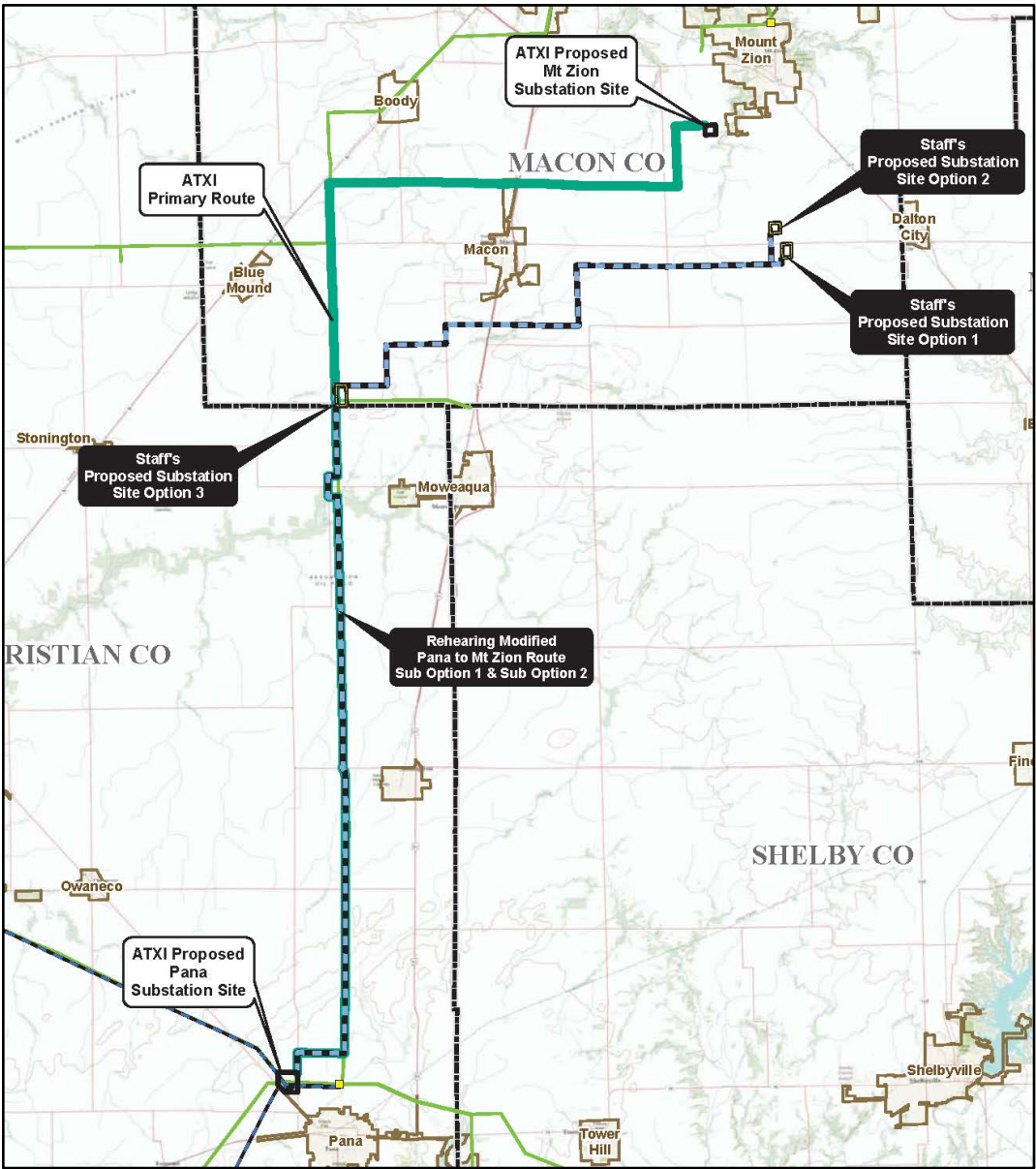
Q. Figure 5 in your direct testimony on rehearing shows a route connecting a new Mt. Zion substation with the portion of the Mt. Zion to Kansas line approved in the August 2013 Final Order. Is the configuration shown in Figure 5 still ATXI's recommendation?

A. Yes. Mr. Hackman, however, addresses Staff's three proposed alternative locations for the Mt. Zion substation and explains that the Company would not object to two of those alternatives, which he describes in testimony as Options 1 and 2.

Q. Has ATXI developed a route that will accommodate Staff's Option 1 or 2 substation locations?

A. Yes. As shown in Figure 1 below, ATXI's proposed route would follow ATXI's Primary Route from the Pana substation until it meets Staff's proposed Kincaid route just north of the Christian/Macon County line. From that point, the route follows Staff's proposed route until it meets Staff's Option 1 and 2 substation sites. From these alternative Mt. Zion substation sites, ATXI's proposed route follows ATXI's Primary Route north to connect to ATXI's proposed route which continues on to connect to the Mt. Zion to Kansas approved route (as depicted on Figure 5 in my direct testimony)

75 A. Figure 1.



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77

78 **Q. Do either of Staff's Option 1 or 2 substation sites present any routing concerns?**

79 **A.** No. The land crossed is mostly agricultural and the terrain is mostly flat. There are no
80 known impediments to construction on this route.

81 **Q. Have any Intervenors filed direct testimony on rehearing concerning the Mt. Zion to**
82 **Kansas route?**

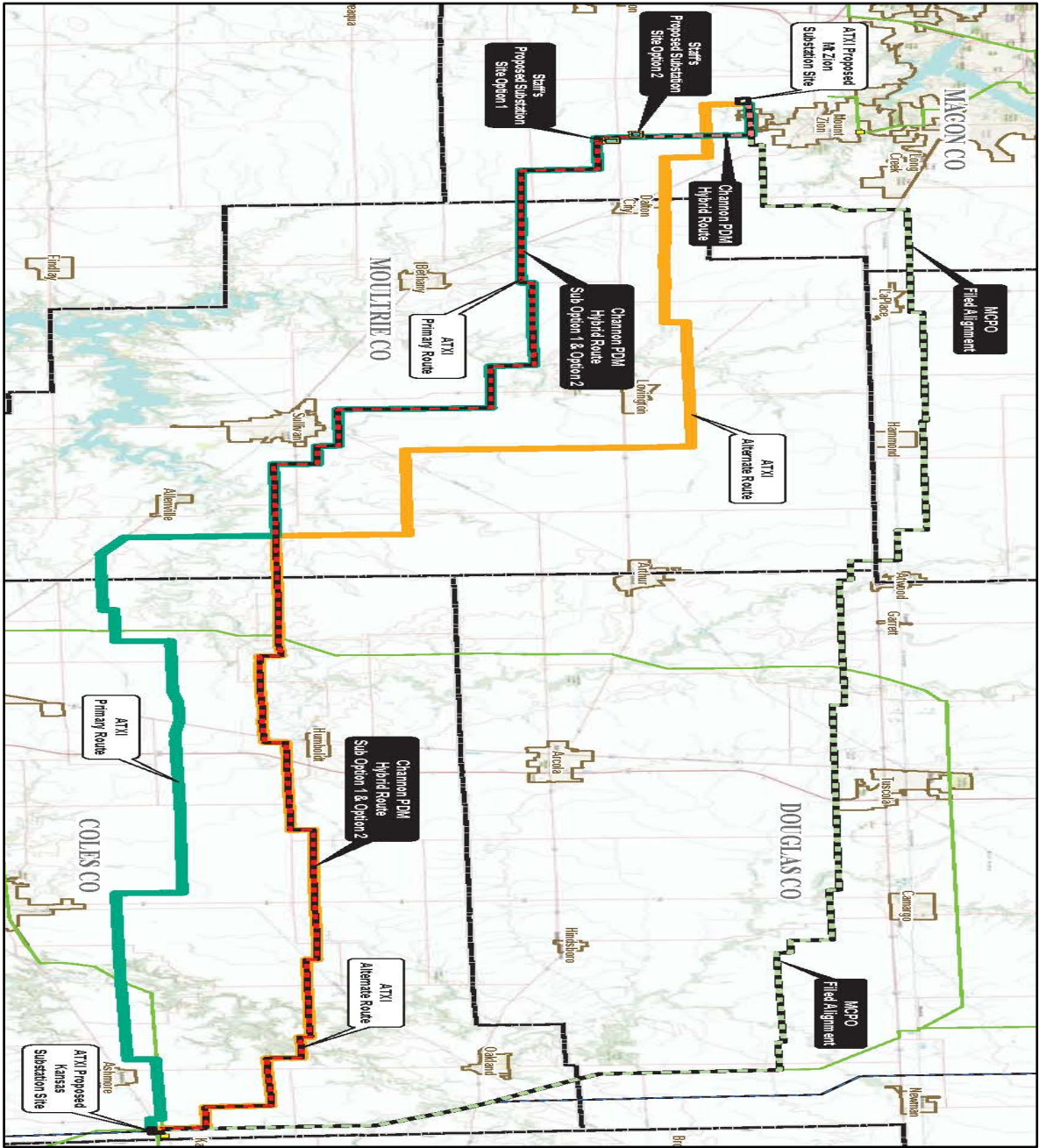
83 **A.** Yes. PDM and the Channon Family Trust advocate a route that would consist of the
84 western portion of ATXI's Primary Route, until it intersects with ATXI's Alternate Route. From
85 this point of intersection, their route proposal would then follow ATXI's Alternate Route to the
86 Kansas Substation. This hybrid route is shown on Figure 2.

87

88

Figure 2.

89



90 **V.** **CONCLUSION**

91 **Q.** **Does this conclude your rebuttal testimony on rehearing?**

92 **A.** Yes, it does.